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May 13, 2021

BY ECF

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Daniel L. Stein
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Re: *United States v. Brian Kolfage, et al.*,
20 Cr.412 (AT)

Dear Judge Torres:

As you know, we represent Andrew Badolato in the above-captioned matter. Mr. Badolato has been released, subject to conditions, including a condition restricting his travel to the Middle District of Florida, the Southern District of New York, the District of Columbia, and all points in between for the purpose of traveling to meet with counsel. Since Mr. Badolato's livelihood as an entrepreneur largely requires travel to various parts of the country to conduct business, the condition restricting his travel has adversely impacted Mr. Badolato's ability to financially support himself and his family.

Mr. Badolato has diligently adhered to all of the conditions of his pretrial release and he has timely appeared for all hearings. A modification of the conditions restricting his travel will make it possible for Mr. Badolato to earn a regular income during the pendency of this matter.

Accordingly, we respectfully request a permanent modification to Mr. Badolato's pretrial release conditions to allow him to travel within the continental United States. All travel outside of the Middle District of Florida, where Mr. Badolato currently resides, will be subject to pre-approval and monitoring by his supervising Pretrial Services Officer, Jim Haskett. Pretrial Services has advised that it has no objections to this modification. We have also advised government counsel of this modification and AUSA Robert Sobelman has advised that the Government has no objection.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Daniel L. Stein".

Daniel L. Stein
Partner

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cc: All Counsel of Record
Jim Haskett
U.S. Pretrial Services Officer (via email)